

good faith effort to resolve the discovery matters at issue, and that Movant and Respondent were unable to resolve the issue.

WHEREFORE, Movant Nicole Eramo respectfully requests that the Court grant her Motion for Additional Time to Depose “Jackie,” and enter an order permitting Plaintiff a total of 6.5 hours to question Jackie on the record, exclusive of breaks, extended objections, colloquy among counsel, and/or court conferences.

Dated: March 15, 2016

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Plaintiff's Motion for Additional Time to Depose "Jackie" in the above-captioned matter was served on the below counsel of record on March 15, 2016, via the Court's electronic filing system (for those attorneys that have registered), and via email and Federal Express (for Jackie's counsel).

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Dated: March 15, 2016

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